



O'MELVENY & MYERS LLP

BEIJING
BRUSSELS
CENTURY CITY
HONG KONG
LONDON
LOS ANGELES
NEWPORT BEACH

Times Square Tower
7 Times Square
New York, New York 10036-6524

TELEPHONE (212) 326-2000
FACSIMILE (212) 326-2061
www.omm.com

SAN FRANCISCO
SEOUL
SHANGHAI
SILICON VALLEY
SINGAPORE
TOKYO
WASHINGTON, D.C.

June 23, 2015

WRITER'S DIRECT DIAL
(212) 408-2409

BY ECF

WRITER'S E-MAIL ADDRESS
jrosenberg@omm.com

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Marathon Asset Management, LP v. Wilmington Trust, N.A.*, Case No. 1:15-cv-04727 (AT)(AJP)

Dear Judge Torres:

We represent Angelo Gordon & Co., LP, Apollo Advisors VII, L.P., and Brookfield Asset Management Private Institutional Capital Adviser (Canada), L.P. (collectively the "Intervenor Defendants") and respectfully submit this letter to request that the Intervenor Defendants' and defendant Wilmington Trust, N.A.'s ("Wilmington Trust") time to respond to Plaintiff Marathon Asset Managements, LP's ("Marathon") complaint be extended to July 20, 2015.

The Intervenor Defendants removed this action from New York State Supreme Court on June 17, 2015. Under Fed. R. Civ. Proc. 81(c)(2), the Intervenor Defendants' time to respond to Marathon's complaint currently expires on the later of seven days after filing the Notice of Removal (*i.e.*, June 24, 2015) or 21 days after service of the complaint in the underlying state law action (*i.e.*, July 2, 2015).¹ This is the Intervenor Defendants' and Wilmington Trust's first request for an extension of time to respond to the complaint. Marathon has consented to the extension.

¹ The New York State Supreme Court granted the Intervenor Defendants' stipulation of intervention on June 12, 2015. The Intervenor Defendants were not served with the complaint and were not parties to this action before that date.

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Respectfully Submitted,

/s/ Jonathan Rosenberg

Jonathan Rosenberg
Partner
of O'MELVENY & MYERS LLP

JR

cc: All Counsel of Record